

OUTTEN & GOLDEN LLP

*Advocates for Workplace Fairness*

March 16, 2015

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**Via ECF**

The Honorable Analisa Torres  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: Chen-Oster, et al. v. Goldman, Sachs & Co., et al., No 10 Civ. 6950 (AT) (JCF)**

Dear Judge Torres:

On behalf of Plaintiffs and Defendants in this action, and pursuant to Your Honor's Individual Practices I.D., we jointly write with respect to the schedule for filing written objections to Magistrate Judge Francis's Report and Recommendation, dated March 10, 2015 (Docket No. 364), and written responses to those objections.

Under Federal Rule of Civil Procedure Rule 72(b)(2), the parties must file written objections within 14 days of the issuance of the Report and Recommendation, and a party may file a written response to another party's objections within 14 days of being served with those objections. The parties have conferred and jointly request a 45-day extension of their time to file their respective objections to the Report and Recommendation and a 21-day extension of their time to submit a response to those objections. This is the parties' first request for an extension. The parties believe that this schedule is warranted here, because of the number of issues addressed in the Report and Recommendation.

Accordingly, the parties respectfully request that Your Honor extend the deadlines for each party to file: (i) their objections to the Report and Recommendation from Tuesday, March 24, 2015, to Friday, May 8, 2015, and (ii) their responses to those objections from Friday, May 22, 2015, to Friday, June 12, 2015. We also request that any objections and responses to Judge Francis's Memorandum and Order, dated March 10, 2015 (Docket No. 363), addressing the parties' respective motions to exclude certain evidence submitted in connection with the class certification motion, be filed in accordance with this schedule, specifically, for objections, on May 8, 2015, and for responses, on June 12, 2015.

Respectfully submitted,

/s/ Cara E. Greene

**Outten & Golden LLP**  
3 Park Avenue, 29<sup>th</sup> Floor  
New York, New York 10016  
*Attorneys for Plaintiffs  
and the Putative Class*

/s/ Robert J. Giuffra Jr.

**Sullivan & Cromwell LLP**  
125 Broad Street  
New York, New York 10004  
*Attorneys for Defendants*

cc: Barbara B. Brown, Esq. (via Email and ECF)  
Theodore O. Rogers, Esq. (via Email and ECF)  
Adam T. Klein, Esq. (via Email and ECF)  
Kelly M. Dermody, Esq. (via Email and ECF))  
Rachel Geman, Esq. (via Email and ECF)  
Anne B. Shaver, Esq. (via Email and ECF)

GRANTED. The parties shall adhere to the aforementioned deadlines. Decision on Plaintiffs' motion is held in abeyance, pending the parties' submissions. The Clerk of Court is directed to terminate the motion at ECF No. 246.

SO ORDERED.

Dated: March 16, 2015  
New York, New York



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**ANALISA TORRES**  
United States District Judge